

Exhibit G

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JOE LEWIS LUQUE, *et al.*,

Plaintiffs,

v.

3:09CV5885 (CRB)

AT&T CORP., *et al.*,

Defendants.

**DECLARATION OF LEE SERONELLO IN SUPPORT OF PLAINTIFFS'
MOTION FOR COLLECTIVE ACTION CERTIFICATION**

I, LEE SERONELLO, hereby declare as follows:

1. I make this Declaration based upon personal knowledge.

2. I am over 21 years of age and fully competent to make this Declaration. My address is 14 Ridgetop Way, Napa, California 94558.

OVERVIEW OF MY JOB AS A LEVEL ONE MANAGER

3. I am a **Level One Manager for Cable Maintenance** at the Pacific Bell Telephone Co. ("PacBell") in Napa. I am classified as exempt from overtime pay. My main job is to pass information between the company and a group of technicians who go into the field to make repairs to the cables and other hardware that deliver the company's services. Because I work with technicians in the field, I am also known as a **Field Manager**. I have minimal authority over the technicians that I work with and exercise very little discretion in performing my job duties. My job requires me to work an average of 60 hours per week but the company does not pay me overtime wages because I am classified as an exempt employee.

My Employment History at PacBell

4. I started working for PacBell as a Level One Construction Manager in El Sobrante in 1997.

5. Since that time, the company has undergone a series of changes and was bought by SBC and then later AT&T. My work situation changed drastically in 2007 when AT&T bought the company. I am now micromanaged in my role and am left with little authority to make decisions. Additionally, my work hours have escalated.

My Work Schedule

6. I work at least 60 hours per week and have worked many 80 hour weeks.
7. I have never been paid overtime wages for hours over 40 that I work.
8. Approximately every five weeks, I work the “duty” shift. During this shift, I am on call 24 hours per day for seven days. I go into the office for a typical workday and then I am on call through the evening and night, and over the weekend. It is common for me to receive calls in the middle of the night.

Nature of My Work

9. I do not have the authority to manage my own schedule. The company dictates start and end times. Even if I need to visit the dentist for a mere half hour, I am required to call my supervisor for permission.
10. My time is also dictated by the overwhelming number of clerical tasks that I am required to complete. The company claims they do not dictate my schedule, but if tasks are not completed on time, they respond very punitively. In order to meet deadlines, all Level Ones work far more than eight hours per day.
11. I am closely scrutinized and micromanaged through numerous conference calls with supervisors throughout the day. I have very little latitude to make decisions without speaking to my supervisors and have been reprimanded for making minor decisions without consulting upper management.

MY JOB DUTIES AS A LEVEL ONE MANAGER

Routine Job Duties

12. My day is dictated by a document given to us by upper management called the Day in the Life Model. It is a new micromanaging tool which tells Level Ones exactly what we should be doing at all times.
13. I arrive in the office at around 6:15 a.m. each morning.
14. I start the day by pulling up the technicians’ job assignments for the day that are sent to me by the dispatch center. I also pull up the previous day’s technician productivity numbers which are generated by the computer system.
15. Around 7:00 a.m. each day, I have to listen in on a conference call during which my Level Two Manager discusses the “load” (the jobs to be completed that day) and gives us instructions on any changes to be made. He adjusts assignments according to absences and makes decisions about how jobs should be done.

16. Once the technicians come in, I distribute their assignments as designated by dispatch and read to them any new policy or safety directives that are issued by the company.

17. The technicians usually leave for their worksites between 8:15 and 8:30 a.m.

18. I spend much of the remainder of the day performing clerical tasks, filling out routine paperwork related to the work of the technicians, and following the location and progress of the technicians in the field.

19. The Day in the Life Model says that I should be visiting technicians in the field from 9:30 a.m. until 2:30 p.m.. This absolutely never happens, for me or for any of my fellow Field Managers. There is so much paperwork that I have to complete that I usually cannot make it into the field for as long as I should.

20. When I do make it into the field, I am required to perform basic safety and quality inspections of the technicians. At most, I make it to the work sites for an hour per day. Clearly, the title Field Manager is a misnomer.

21. I normally go home at around 5:30 p.m. each day, but I am on call in the evenings and through the night.

22. I often have to work after hours, particularly if there is a cable failure. If it is raining, I typically have to work all weekend.

Discipline of Technicians

23. I have only minimal involvement in disciplining technicians. Discipline is strictly dictated by company policy and decisions are normally made by Human Resources or upper management.

24. For example, if a technician is repeatedly absent, I must consult Human Resources for a disciplinary recommendation. I have to collect the technician's records from the previous three years and pass that information to Human Resources. They then make a disciplinary decision. which I have to communicate to the technician.

25. Last year, I had two instances of technicians who were in minor car accidents where the mirrors on their vehicles were clipped. The total cost to repair a mirror is minimal, around \$12.00, but in both cases, my Level Two ordered that the technicians be suspended for three days. I protested that I did not think the technicians should be punished for such minor damage. Three days' suspension of a technician means \$720 lost, which is out of proportion for a \$12 mirror. In both cases the Level Two ignored my views and threatened to fire me if I did not stop protesting.

Quality/ Safety Inspections

26. I am required to conduct one safety inspection per technician, per month. I have 21 technicians so this translates to 21 safety inspections per month. I also have to conduct thirty quality inspections per month.

27. I conduct these inspections using a form checklist given to me by the company. The checklists are comprised of basic "yes" or "no" questions on quality and safety issues. These inspections require minimal judgment on my part. I simply make observations and check off the appropriate box on the form.

Hiring/Firing and Promotion of Technicians

28. I cannot hire technicians or select the technicians that I work with. They are assigned to me by the company.

29. I do not have the authority to fire technicians. Termination is handled by my supervisors and, as with discipline, is based on recommendations from Human Resources.

30. In one instance in 2007, I found that several technicians were making YouTube videos that were extremely derogatory to the company. I believed they should have been terminated, but my suggestion was ignored completely. My Level Two suspended the technicians.

Training

31. I have very little involvement in training technicians. The majority of technician training is done by the District Office or at company training centers.

I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: April 30, 2010
Napa, California



Lee Seronello